

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

**In re: HEALTH DIAGNOSTIC LABORTORY,
INC., et. al.,
Debtors.**

**Case No. 15-32919-KRH
Chapter 11**

**VERIFIED STATEMENT OF ATTORNEYS FOR CREDITORS
PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2019**

COME NOW William A. Gray, Roy M. Terry, Jr., W. Ashley Burgess, John C. Smith, Eric C. Howlett, and the law firm of Sands Anderson PC ("**Sands Anderson**"), as counsel for the parties in interest listed on **EXHIBIT A** attached hereto and incorporated herein by reference (collectively, the "**Clients**"), and make the following verified statement pursuant to *Federal Rule of Bankruptcy Procedure* 2019.

1. Sands Anderson has been retained by the Clients, whose names, addresses and brief explanations of their interests are as follows:

- a. **Fabricio J. Alarcon, MD**
100 Eaton Lane
Milton, DE 19968
Telephone: 302-855-1233

William A. Gray, VSB No. 46911
Roy M. Terry, Jr., VSB No. 17764
W. Ashley Burgess, VSB No. 67998
John C. Smith, VSB No. 44556
Eric C. Howlett, VSB No. 82237
SANDS ANDERSON PC
P.O. Box 1998
Richmond, Virginia 23218-1998
Telephone: 804.648.1636
Facsimile: 804.783.7291

Counsel for Fabricio J. Alarcon, MD; Associates in Cardiology, LLC and Ann Giles; BCMW Investments, LLC; Hardeep S. Dhaliwal, M.D., P.A. and Hardeep S. Dhaliwal, M.D.; Internal Medicine Associates of McMinn County, P.C.; Jaspaul S. Bhangoo, M.D., P.A. and Jaspaul S. Bhangoo, M.D.; The Maggie L. Walkers Governor's School for Government & International Studies Foundation, Inc.; Network for Effective Women's Services, P.C. and Dr. Elizabeth L. Schultz; Palm Beach Cardiovascular Clinic, L.C., Augusto Villa, MD, Agustin Vargas, MD, Gonzalo Loveday, MD, Chauncey Crandall, IV, MD and Gabriel Breuer, MD; Richmond Kickers Youth Soccer Club, Inc.; Robert L. Thomas, MD, FCCP, LLC and Robert L. Thomas, MD; Winter Park Family Practice, LLC, d/b/a Family Practice of Winter Park and Vares R. Patel, DO

Nature of Interest: Defense of claims asserted by Richard Arrowsmith in his capacity as Liquidation Trustee of the HDL Liquidating Trust (the "**Liquidating Trustee**").

- b. **Associates In Cardiology, LLC and Ann Giles**
c/o Denise Crecelius, SCLA
Kentucky Farm Bureau Mutual Insurance Company
P.O. Box 20900
Louisville, KY 40250
Telephone: 859-254-8074

Nature of Interest: Defense of claims asserted by the Liquidating Trustee.

- c. **BCMW Investments, LLC**
c/o Barry Carter, MD
BCMW Investments, LLC
12561 Crick Hollow Court
Oklahoma City, OK 73170
Telephone: 405-818-0444

Nature of Interest: Defense of claims asserted by the Liquidating Trustee.

- d. **Hardeep S. Dhaliwal, M.D., P.A., and Hardeep S. Dhaliwal, M.D.**
3871 Long Prairie Road
Flower Mound, TX 75028
Telephone: 972-691-4444

Nature of Interest: Defense of claims asserted by the Liquidating Trustee.

- e. **Internal Medicine Associates of McMinn County, P.C.**
c/o Nathan Trentham, MD
P.O. Box 325
Etowah, TN 37331-0325
Telephone: 423-263-2444

Nature of Interest: Defense of claims asserted by the Liquidating Trustee.

- f. **Jaspaul S. Bhangoo, M.D., P.A. and Jaspaul S. Bhangoo, M.D.**
5105 Lighthouse Drive
Flower Mound, TX 75022
Telephone: 214-684-9239

Nature of Interest: Defense of claims asserted by the Liquidating Trustee.

- g. **The Maggie L. Walker Governor's School for Government & International Studies Foundation, Inc.**
1000 N. Lombardy Street
Richmond, VA 23220
Telephone: 804-354-1566

Nature of Interest: Defense of claims asserted by the Liquidating Trustee.

- h. **Network for Effective Women's Services, P.C., and Dr. Elizabeth L. Schultz**
1351 Stonebridge Parkway, Suite 106
Watkinsville, GA 30677
Telephone: 706-769-0720

Nature of Interest: Defense of claims asserted by the Liquidating Trustee.

- i. **Palm Beach Cardiovascular Clinic, L.C.; Augusto Villa, MD; Agustin Vargas, MD; Gonzalo Loveday, MD; Chauncey Crandall, IV, MD and Gabriel Breuer, MD**
600 University Blvd., Suite 200
Jupiter, FL 33458
Telephone: 561-627-2601

Nature of Interest: Defense of claims asserted by the Liquidating Trustee.

- j. **Richmond Kickers Youth Soccer Club, Inc.**
c/o LeClairRyan
919 East Main Street, 24th Floor
Richmond, VA 23219
Telephone: 804-783-7632

Nature of Interest: Defense of claims asserted by the Liquidating Trustee.

- k. **Robert L. Thomas, MD, FCCP, LLC and Robert L. Thomas, MD**
c/o Margie Bright Matthews
205 East Washington Street
P.O. Box 499
Walterboro, SC 29488
Telephone: 843-549-6028

Nature of Interest: Defense of claims asserted by the Liquidating Trustee.

- l. **Winter Park Family Practice, LLC, d/b/a Family Practice of Winter Park and Varesh R. Patel, DO**
c/o Varesh R. Patel, DO

Advance Family Practice
1910 N. Orange Avenue
Orlando, FL 32804
Telephone: 407-898-1451

Nature of Interest: Defense of claims asserted by the Liquidating Trustee.

2. The facts and circumstances relating to the employment of Sands Anderson by the Clients are that Sands Anderson serves as bankruptcy counsel to the Clients to represent and defend their interests in certain avoidance actions filed by the Liquidating Trustee in the Debtor's bankruptcy case. The Clients are billed monthly at Sands Anderson's normal hourly rates for its shareholders, counsel, associates, and legal assistants, for time spent and for costs incurred in providing legal services, pursuant to Sands Anderson's standard terms and engagement.

3. The Clients have been advised of, and have consented to, Sands Anderson's representation of all other clients.

4. Sands Anderson reserves the right to supplement and/or amend this Statement at any time in the future.

Date: May 15, 2017

Respectfully submitted,

SANDS ANDERSON PC

/s/ William A. Gray

William A. Gray, VSB No. 46911

Roy M. Terry, Jr., VSB No. 17764

W. Ashley Burgess, VSB No. 67998

John C. Smith, VSB No. 44556

Eric C. Howlett, VSB No. 82237

SANDS ANDERSON PC

P.O. Box 1998

Richmond, Virginia 23218-1998

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Counsel for Fabricio J. Alarcon, MD; Associates in Cardiology, LLC and Ann Giles; BCMW Investments, LLC; Hardeep S. Dhaliwal, M.D., P.A. and Hardeep S. Dhaliwal, M.D.; Internal Medicine Associates of McMinn County, P.C.; Jaspaul S. Bhangoo, M.D., P.A. and Jaspaul S. Bhangoo, M.D.; The Maggie L. Walker Governor's School for Government & International Studies Foundation, Inc.; Network for Effective Women's Services, P.C. and Dr. Elizabeth L. Schultz; Palm Beach Cardiovascular Clinic, L.C., Augusto Villa, MD, Agustin Vargas, MD, Gonzalo Loveday, MD, Chauncey Crandall, IV, MD and Gabriel Breuer, MD; Richmond Kickers Youth Soccer Club, Inc.; Robert L. Thomas, MD, FCCP, LLC and Robert L. Thomas, MD; Winter Park Family Practice, LLC, d/b/a Family Practice of Winter Park and Varesh R. Patel, DO

VERIFICATION

I, William A. Gray, an attorney with Sands Anderson PC, after due inquiry declare under penalty of perjury, and pursuant to 28 U.S.C. § 1746, that the facts and representations set forth in this Verified Statement in accordance with Bankruptcy Rule 2019 are true and correct to the best of my knowledge and belief.

/s/ William A. Gray

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of May, 2017, a true copy of the foregoing was electronically filed with the Court using the CM/ECF system, which provides electronic notification to all parties receiving notice in this case including: counsel for the Debtors and the Office of the U.S. Trustee.

/s/ William A. Gray

EXHIBIT A TO RULE 2019 STATEMENT

Creditor
Fabricio J. Alarcon, MD
Associates In Cardiology, LLC and Ann Giles
BCMW Investments, LLC
Hardeep C. Dhaliwal, M.D., P.A., and Hardeep S. Dhaliwal, M.D.
Internal Medicine Associates of McMinn County, P.C.
Jaspaul S. Bhangoo, M.D., P.A. and Jaspaul S. Bhangoo, M.D.
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